REMARKS

Claims 1-26 are pending and under consideration. Claims 1-26 were rejected in the Final Office Action mailed October 12, 2005. In this Response After Final, no claims are added, canceled, or amended.

I. Non-Statutory Double Patenting Rejection of Claims 1-26:

The Examiner provisionally rejected claims 1-26 under the judicially-created doctrine of obviousness-type double patenting as being unpatentable over claims 1-56 of co-pending Application No. 10/005,783 (Attorney Docket No. 30014200-1005) in view of *Motoyama (U.S. Patent No. 5,535,318)*. This rejection is moot in view of the terminal disclaimer submitted herewith.

II. Rejection of claims 1-4, 6-15, and 17-25 under 35 U.S.C. §103(a) as being allegedly unpatentable over *Calder (U.S. Patent No. 5,963,972) in view of Lomet (U.S. Patent No. 5,963,972)*:

Applicants respectfully traverse the rejection.

Independent claims 1, 8, 12, 20, 23, and 24 are directed to subject matter relating to developing a data flow program comprising code segments. Data read and data write identifiers are stored for each code segment. The data read and data write identifiers identify at least a portion of the data read or written by a code segment. Dependencies are determined based on the data read and data write identifiers. Claim 19 claims similar subject matter.

The combination of *Calder* and *Lomet* fails to teach or suggest all of the limitations of independent claims 1, 8, 12, 19, 20, 23, and 24. For example, the combination of *Calder* and

Lomet fails to teach or suggest *storing data read and data write identifiers for each code segment, the data read and data write identifiers identifying at least a portion of the data read or written by the code segment.* The Examiner concedes that *Calder* fails to teach this limitation, but cites column 18, lines 30-31 and 55-59 of *Lomet* as allegedly teaching Applicants' data read and data write identifiers. Specifically, the Examiner contends the "state identifier field" disclosed in *Lomet* teaches the read and write identifiers of the present claims. Applicants respectfully submit that this contention is incorrect.

In *Lomet*, the state identifier field is found in a cache manager object table that holds a list of objects that are stored in a volatile cache, or that have flush dependencies with an object stored in the volatile cache. State identifier fields are associated with each object in the cache managed by the cache manager. See column 18, lines 12-15 and 30-31 of *Lomet.* Unlike claim 1, *e.g.*, *Lomet's* state identifier fields are not stored for or associated with a code segment. Thus, *Lomet* does not teach or suggest *storing data read and data write identifiers for each code segment.* Furthermore, the state identifier fields stores a state ID for that record of the object in the cache. The state ID indicates whether the object has been modified without storing those modifications in stable memory. See column 18, lines 30-34 of *Lomet.* This state ID is merely a flag bit, and thus does not identify a portion of data. Thus, *Lomet's* state IDs are not *read and data write identifiers identifying at least a portion of the data read or written by the code segment.* See paragraphs 72 and 73 of the patent application. Since *Calder* and *Lomet* clearly fail to teach or suggest the read and write identifiers of the present claims, the combination clearly cannot teach or suggest determining dependencies based on these identifiers. Therefore, *Calder* and *Lomet* fail to disclose or even suggest independent claims 1, 8, 12, 19, 20, 23, and 24.

Claims 2-7, 9-11, 13-18, 21, 22, 25, and 26 depend directly or indirectly from claim 1, 8, 12, 20, or 24 and are therefore allowable for at least the same reasons that claims 1, 8, 12, 20, and 24 are allowable.

Applicants respectfully submit the rejection has been overcome and request that it be withdrawn.

III. Rejection of claims 5, 16, and 26 under 35 U.S.C. §103(a) as being allegedly unpatentable over *Calder (U.S. Patent No. 5,963,972)* in view of *Lomet (U.S. Patent No. 5,963,972)*, and further in view of *Cai (U.S. Patent No. 6,349,363)*:

Applicants respectfully traverse the rejection.

Claims 1, 12, and 24 are allowable as discussed above. *Cai* still fails to disclose or suggest Applicants' claimed data read and data write identifiers and fails to disclose or suggest determining dependencies based on the data read and data write identifiers. Therefore, *Calder* in view of *Lomet* and *Cai* still fails to disclose or suggest claims 1, 12, and 24.

Claims 5, 16, and 26 depend directly or indirectly from claims 1, 12, or 24 and are therefore allowable for at least the same reasons that claims 1, 12, and 24 are allowable.

Applicants respectfully submit the rejection has been overcome and request that it be withdrawn.

CONCLUSION

In view of the foregoing, it is submitted that claims 1-26 are patentable. It is therefore submitted that the application is in condition for allowance. Notice to that effect is respectfully requested.

Respectfully submitted,

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